

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

DEFENDANTS' PRE-TRIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)(3)(A)

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc., by counsel and in accordance with Fed. R. Civ. P. 26(a)(3)(A) and this Court's December 7, 2016 Order (Dkt. 125), submit the following Pre-Trial Disclosures.

A. Disclosures Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i)

Attached as Exhibit A is a list of the witnesses Defendants anticipate they will call at trial. This list separately identifies those witnesses Defendants may call if the need arises. In addition to the persons listed on Exhibit A, Defendants reserve the right to call as a witness any person identified on Plaintiffs' witness list and not objected to by Defendants, and to call such additional witnesses for the purposes of impeachment or rebuttal as the Defendants deem appropriate.

B. Disclosures Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(ii)

Attached as Exhibit B is a designation of those witnesses whose testimony Defendants expect to present by deposition along with the relevant portion of the deposition transcripts

highlighted with all unnecessary and/or irrelevant matters and objections and statements of counsel removed. Defendants further reserve the right to use additional testimony not listed on the attached Exhibit B for purposes of impeachment and/or rebuttal.

C. Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(iii)

Attached as Exhibit C is the list of exhibits Defendants anticipate they will offer at trial. This list separately identifies the exhibits that Defendants may offer if the need arises. Defendants reserve the right to use any exhibit on Plaintiffs' exhibit list to which Defendants do not object. Further, Defendants reserve the right to use enlargements of any of the exhibits on the attached list, as well as summary and demonstrative exhibits as may assist the jury and the Court. Defendants further reserve the right to use additional documents not listed on the attached list for purposes of impeachment and/or rebuttal.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Grayson P. Hanes (VSB No. 06614)
Michael S. Dingman (VSB No. 30031)
Justin deBettencourt (VSB No. 83806)
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2017, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Grayson P. Hanes (VSB No. 06614)

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

ghanes@reedsmith.com

mdingman@reedsmith.com

jdebettencourt@reedsmith.com